



April 3, 2017

VIA ECF & FACSIMILE (212-805-7986)

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Mr. Isaza Tuzman to seek permission for him to travel for the upcoming Passover holiday. The U.S. Attorney's Office does not oppose this request. Although Pretrial Services generally does not consent to such requests as a policy matter, it has no specific objection in this particular case.

Specifically, Mr. Isaza Tuzman seeks permission to travel by car to the Philadelphia area on April 11 and return on April 13. He would stay at his Uncle Martin Tuzman's house at 707 Rambler Road in Elkins Park, where he has stayed in the past, and would attend religious services and family gatherings in the Philadelphia area (including Southern New Jersey). Then, on April 15, he would travel to Massachusetts and stay at his father's house in Holyoke, or at the Howard Johnson Motor Inn in Hadley, where he has previously stayed, and return on April 18. All other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.

There have been several prior, approved requests for Mr. Isaza Tuzman to travel outside this District (ECF Nos. 94, 101, 112, 119, 123, 125, 150, and 197), and each time he left from and returned to the District as scheduled and without incident.

We thank the Court in advance for its consideration.

Respectfully submitted,

/s/ Silvia L. Serpe
Silvia L. Serpe
SERPE RYAN LLP
1115 Broadway, 12th Floor
New York, New York 10010
Counsel for Kaleil Isaza Tuzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via E-mail)